

Exhibit C

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

*** HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY ***

VIDEOTAPED DEPOSITION OF SIDNEY MAJALYA
San Francisco, California
Wednesday, December 20, 2017
Volume I

Reported by:
CARLA SOARES
CSR No. 5908
Job No. 2779413

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1 don't -- but Salle may have already been on it. So 13:47:27

2 I don't exactly remember who she forwarded the
3 e-mail to.

4 Q Do you know if Mr. Kalanick forwarded
5 Mr. Jacobs' e-mail to anyone? 13:47:40

6 A I don't.

7 Q Do you know if Ms. Hazelbaker forwarded it
8 to anybody?

9 A I didn't even recall that she received it.

10 Q If you look at the bottom of Exhibit 9659, 13:47:49
11 you'll see that she's on the e-mail from Mr. Jacobs,
12 right?

13 A Yes.

14 Q Do you see that Ms. Hornsey is also on the
15 e-mail? 13:47:57

16 A I do.

17 Q Do you know if Ms. Hornsey forwarded
18 Mr. Jacobs' resignation e-mail to anybody?

19 A I do not.

20 Q When you received Mr. Jacobs' resignation 13:48:07
21 e-mail, who did you discuss it with, other than
22 Mr. Spiegler and Ms. Yoo?

23 A I think I already testified that I
24 discussed it at some point with Ms. Padilla.

25 Q Anybody else? 13:48:22

1 A I do. 14:07:01

2 Q So he was forwarding Mr. Jacobs' lawyer's
3 demand letter to those people on the e-mail chain,
4 right?

5 MS. DUNN: Objection. Foundation. 14:07:12

6 THE WITNESS: Apparently. So it appears.

7 BY MR. EISEMAN:

8 Q And who are those people that he forwarded
9 the e-mail to?

10 A I have no idea, other than Stacey 14:07:21
11 Sprenkel, who I said earlier was working with us on
12 our assessment. I don't know any of the other
13 individuals.

14 Q Well, you know Arturo Gonzalez, don't you?

15 A I know who he is. 14:07:34

16 Q Right.

17 A But I -- I know that he represents Uber in
18 the Waymo case.

19 Q Do you have any information as to why
20 Mr. Duross sent the April 19th Jacobs demand letter 14:07:43
21 to this group of people?

22 MS. DUNN: Objection. Form.

23 THE WITNESS: I do not.

24 BY MR. EISEMAN:

25 Q Were these some of the people who were 14:07:53

1 A I don't -- that's an excellent question. 14:51:13

2 I don't exactly know.

3 Q Did you interact with O'Melveny & Myers in
4 connection with any of Mr. Jacobs' allegations?

5 A I've interacted with O'Melveny & Myers, 14:51:29
6 but I would not say it was specifically related to
7 the allegations in the Jacobs letter.

8 Q What about Mr. Jacobs' allegations
9 generally, not just limited to the letter? Did you
10 interact with O'Melveny & Myers? 14:51:43

11 MS. DUNN: Form.

12 THE WITNESS: Not with respect to Jacobs.

13 BY MR. EISEMAN:

14 Q Did you interact with Shearman & Sterling
15 with regard to Mr. Jacobs' allegations? 14:51:52

16 A We may have had one meeting, one or two
17 conversations with Patrick Robbins about the Jacobs
18 matter.

19 Q When you say "we," do you mean you and Joe
20 Spiegler? 14:52:14

21 A Joe Spiegler and myself. Yeah.

22 Q Do you know when that meeting took place?

23 A I don't. Likely it would have been in the
24 June time frame at some point, but I don't have a
25 specific recollection. 14:52:29

1 those are the people that I recall having any 15:06:08
2 knowledge or interaction about the Jacobs letter and
3 allegations.

4 Q Do you know if anybody besides Ms. Padilla
5 and the litigation group at Uber knew about the 15:06:18
6 letter?

7 A Oh, let me -- I'm sorry. Let me add one
8 more person to my prior answer.

9 I believe Candace Kelly at some time also
10 knew. 15:06:31

11 Q Right. Okay. Anybody else?

12 A No. I'm sorry. If you could repeat your
13 last question.

14 Q Yeah.

17 A Other than Angela, I don't think so.

18 And again, when you say "the litigation
19 group," the litigation and employment group are both
20 under Angela's auspices, but I'm separating them for 15:07:04
21 purposes of this response.

22 MR. EISEMAN: All right. Let's mark as
23 Exhibit 9664 the next document.

24 (Exhibit 9664 was marked for
25 identification and is attached hereto.) 15:07:21

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, do hereby
3 certify:

4 That the foregoing proceedings were taken
5 before me at the time and place herein set forth;
6 that any witnesses in the foregoing proceedings,
7 prior to testifying, were administered an oath; that
8 a record of the proceedings was made by me using
9 machine shorthand which was thereafter transcribed
under my direction; that the foregoing transcript is
a true record of the testimony given.

10 Further, that if the foregoing pertains to
11 the original transcript of a deposition in a Federal
12 Case, before completion of the proceedings, review
of the transcript [] was [X] was not requested.

13 I further certify I am neither financially
14 interested in the action nor a relative or employee
15 of any attorney or any party to this action.

16 IN WITNESS WHEREOF, I have this date
subscribed my name.

17
18 Dated: December 21, 2017

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22 Carla Soares

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24 CARLA SOARES

25 CSR No. 5908